

Golden Lane Housing



Interim Compliance Policy in response to Covid – 19 Restrictions

Date: 16 October 2020

INTERIM POLICY

Interim Compliance Policy in Response to Covid -19 restrictions

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Policy Statement

Golden Lane Housing is committed to ensuring the safety of our tenants and any others that may be affected by the safety of the homes we own and manage.

As a Registered Social Landlord, we have a duty to meet regulatory requirements within our properties. We also have a duty to ensure our tenants, staff and contractors remain safe during this current period of social distancing as a result of the Covid – 19 Pandemic.

GLH will adopt an interim approach to managing repairs, maintenance and compliance within properties during this period ensuring emergency repairs can still be undertaken and mandatory compliance checks are done. A risk assessment approach will be followed for each property taking into account the vulnerabilities of each tenant and the restrictions placed on properties as a result of Covid – 19.

1. Purpose

- 1.1 This interim policy reflects the current agreed approach to managing Health & Safety and regulatory and legal compliance requirements within properties owned or managed by GLH. The policy has been developed taking into account the current legislative and government guidance in light of restrictions posed on individuals and organisations as a result of the Covid – 19 Pandemic.
- 1.2 The policy is to be used as a guidance for all GLH staff managing repairs and maintenance within GLH properties during this time.
- 1.3 The policy sets out the approach to be taken by GLH staff and contractors when undertaking statutory servicing and repairs.
- 1.4 The policy takes into account the particular vulnerabilities of GLH tenants with Learning Disabilities and potential other underlying or associated medical conditions. We will categorise whether the tenant falls within the self-isolating; shielding, or the general vulnerability definition, in the compliance KPI data.
- 1.5 The aim of this policy is to set out the Golden Lane Housing (GLH) approach to compliance for:
 - Emergency Repairs
 - Asbestos Management
 - Electrical Safety
 - Fire Safety
 - Gas Safety
 - Legionella

2. Policy Details

- 2.1 The current operating environment is challenging as a result of Covid – 19 and the restrictions placed on organisations and individuals by the British Government. At the time of writing the length of time restrictions will remain in place are unknown, the position is changing regularly to respond to events and therefore this policy will be reviewed weekly to ensure it remains relevant.
- 2.2 **Property Repairs –**
A 3 Tier system has been introduced by Government with areas of the country experiencing higher levels of restriction due to the risk of COVID transmission (*see

note below), GLH will now deliver repairs following the tiered approach, details of the current Tiers can be found in Appendix D:

Properties in the Very High Risk Area – Tier 3

GLH will undertake only emergency repairs in this area whilst restriction remain in place, we will also attend to all essential compliance checks. Where we are working with other contractor's we will respect their approach to the delivery of services on a case by case basis. All non emergency repairs will be logged by our Repairs Helpdesk and will be assigned to a contractor as soon as restrictions are lifted and the area returns to a lower level of restrictions.

Properties in High Risk Areas - Tier 2

GLH will continue to provide the full repairs service and undertake compliance checks where required. All planned works and non-essential works will be put on hold until restrictions are lowered.

Properties in Medium Risk Area – Tier 1

GLH will continue to provide the full repairs service and undertake compliance checks where required.

When undertaking works in any of the 3 Tiers, the service will be provided with all necessary risk assessments and with the provision of social distancing and all necessary PPE. Repairs will be undertaken under the following requirements;

- Clear access can be gained to the property and social distancing observed giving the operative a safe working area.
- GLH operatives wears appropriate PPE including a mask and disposable gloves.
- All working areas can be disinfected on completion of the works.
- Materials can be sourced to enable the repair to be completed.

GLH **will not** undertake routine, planned and non-essential repairs where the property has declared a COVID incident, whether a support worker or resident at the property has been tested positive. Any Emergency repairs at a property with a COVID infection must carried out following the strictest guidelines to ensure the safety of our staff and the tenants at the property.

*** Note: these measures apply to England only, we are complying with local Government Guidance in Wales and Northern Ireland.**

- 2.3 **Asbestos Management and Legionella** – GLH will pause the current schedule of visits to check asbestos within a property in Tier 3, checks will continue in Tiers 2 and 1. The organisation holds a comprehensive asbestos register and any new properties developed during this period will not be accepted without a valid asbestos report.

Desktop assessments for Legionella will continue during this period, any remedial works required as a result of risk assessments will be put on hold until such times as property visits are allowed once again.

2.4 **Electrical Safety** – GLH will continue to attempt to appoint a qualified contractor to undertake electrical tests during this period. A risk assessment will be undertaken by the Compliance team prior to making an appointment to understand whether the property has:

- A tenant who is in the vulnerable or shielded category
- Anyone at the property displaying symptoms of Covid-19
- Any operational reason the visit cannot go ahead.

We will not attempt to undertake the visit if a tenant is self-isolating with symptoms or is in the shielding category. All correspondence and notes relating to any attempt to gain access will be held on the property file for evidence and the test will be re-booked at the earliest possible opportunity.

2.5 **Fire Safety** – All annual fire/smoke alarm testing will continue in all areas, working with our contractor to ensure all necessary risks have been mitigated.

2.6 **Gas Safety** – We will continue to follow our Gas procedures to obtain a valid gas Certificate. A risk assessment will be undertaken by the Compliance team prior to making an appointment to understand whether the property has:

- A tenant who is in the vulnerable or shielded category
- Anyone at the property displaying symptoms of Covid-19
- Any operational reason the visit cannot go ahead.

GLH will make every attempt to gain access to a property, where access is not possible as a result of any of the above reasons GLH will ensure that the following is clearly recorded on the property file:

- Copy of an email or letter sent to the property confirming that the Gas test has been put on hold as a result of COVID -19 and the reason will be stated. It will state that the situation will be reviewed weekly. (letter Appendix B)
- Copies of all Email correspondence with the tenants, support or family who have made the decision
- Record of all telephone conversations between GLH staff and the tenant, support or family.

On notification that access cannot be obtained, the compliance team will undertake a review of boiler history including age (if available), any previous repairs, and breakdown history. Any concerns relating to the boiler will be risk assessed by the Compliance Manager. Data on each review will be held in a master document and used to support decision making around priority properties when testing can be re-started.

Any non-compliant property will be reviewed weekly to establish whether the situation within the property has changed and the gas service can go ahead as soon as it can be practicably arranged.

2.7 **The Coronavirus Operational Response Survey (CORS)**

The Regulator of Social Housing has set up a survey for RSL's during this period, specific data around compliance will be submitted monthly by GLH to the Regulator highlighting any areas of non-compliance as a result of COVID-19.

3. COVID – 19 Guidelines

- 3.1 *Gas Safe Register Coronavirus (COVID – 19) Advice for Landlords - March 2020*
- 3.2 *Ministry of Housing, Communities and Local Government Covid – 19 Guidance for Landlords and Tenants March 2020*
- 3.3 *HSE Guidance to Landlords Published April 2020.*
- 3.4 *Regulator of Social Housing Statements on Coronavirus (COVID-19) - 8 April 2020*

4. Links to Golden Lane Housing’s Corporate and Strategic Objectives

- 4.1 *This interim policy will have a direct impact on the Asset Management Strategy, our strategy sets out the needs to ensure all properties remain compliant and the current environment we are operating in will mean that in some cases we face breaches in compliance over the next 3-6 months. There will then be a period of catch-up where works may be delayed due to the demand on qualified engineers across the UK who will be tasked with undertaking works that were delayed because of COVID – 19.*

| MONITORING, APPROVAL AND REVIEW | |
|--|--|
| Lead Officer / Author | Melissa O'Donnell – Director of Operations |
| Version No./Date | Version 4 – October 2020 |
| Version Notes | New interim policy |
| Consultation | Head of Compliance, Leadership team, Board |
| Equality Analysis | NA |
| Approved by/Date | 20 April 2020 by GLH Board |
| Policy Review Date | 1 September 2020 |
| Electronic File Location | Leadership Folder |
| Copy available from | Warren Bradley, Director of Legal and Governance |

Appendix A – Golden Lane Housing Gas Servicing Procedure.

Process Actions: GLH & GLH Managed Properties

1. GLH Contractor will send letter to tenants giving 5 working days' notice of service visit.
2. Engineers will attend each property, carding each time a visit is made, up to a maximum of two visits per property. No Access cards will encourage tenants or their Support, to call GLH to arrange suitable access for the work. The Gas Contractor will e-mail the Compliance Officer all No Access calls immediately after each visit, for action.
3. On receipt of the 'No Access' e-mail the Compliance Officer will organise for the tenant/Support to be telephoned to arrange access. An email/ letter will be issued confirming the appointment.

This is **Email/Letter 1**. If a letter has to be sent, it should be sent by first class mail. The **Email/Letter 1** will give the tenant/Support 5 working days' notice to contact GLH to arrange access for this work.

7 working days after the second No Access visit by the Gas Contractor, tenancies where access has not been provided or gained, will enter into the "No Access" process. At this point, ActiveH and the gas database must to be checked to ensure that the e-mail has been received and action taken.

If not, the tenant/support to be telephoned and access arranged and an email/letter sent by first class mail either confirming appointment or giving tenant 5 working days notice to contact the Compliance Officer to arrange access for this work.

(Copy of Email/Letter 1 at Appendix 2)

4. Failure by the tenant/support to contact the Compliance Officer within 5 working days of **Email/Letter 1**, will result in the Compliance Officer contacting the Housing Officer to ascertain if there are extenuating circumstances, such as serious health issues, which may impair the tenant's ability to allow access, to gain alternative contact numbers/email addresses or to ascertain any other circumstances why access has not been provided – such as abandonment, custodial sentences or long term hospital stays.
Where no contact has been made and no circumstances exist, the Compliance Officer will telephone the tenant to arrange access and issue **Email/Letter 2** after 5 working days from issue of **Email/Letter 1**
5. In addition, the Compliance Officer will attempt to contact the tenant by phone to make arrangements for access for the work. When calling by phone, 3 attempts will be made (one in the morning, one in the afternoon and one late call). Dates and times will be noted. If after a further 3 working days no contact has been made, the Compliance Officer will issue **Email/Letter 3** and email the Compliance Manager to advise that access has not been gained.
6. Where the intended action to be taken is to cap the gas supply (if available with external meter), the pro forma should be completed and countersigned by the Housing

Manager prior to proceeding with arrangements. A card will be posted advising the tenant to contact GLH for reinstatement of their gas supply.

When the tenant contacts GLH to reinstate supply, the Compliance Officer will arrange for the appliance to be serviced during the same visit.

7. This is the final stage of Compliance involvement and the case will be handed over to the Housing Manager for pursuance of legal enforcement. Once the LGSR has expired, no other repairs can be undertaken in the tenants home, as the property is deemed to be unsafe. The GLH CRM system must be annotated as such by the Compliance Officer.

If access is gained at any point the process will stop. Consideration will be given to fitting a service interrupter.

6. **Process Actions: GT Properties**

This process can be seen pictorially after the Appendices.

1. 5 working days prior to the current LGSR MoT date, the Compliance Officer will sent the GT an email, outlining that they can undertake their LGSR 2 months prior to the current expiry date without losing the anniversary date.
2. 3 weeks prior to the current LGSR expiry date, the Compliance Officer will email the GT again, advising them of the expiry date.
3. 1 week prior to the current LGSR expiry date, the Compliance Officer will email the GT to advise them that GLH will undertake the LGSR and will recharge them for the work undertaken. The Compliance Officer will email the Compliance Manager to advise them of the action taken and will order an LGSR from the GLH Gas Contractor or other Gas Safe registered Gas Engineer.

If an LGSR is received from the GT at any time, this process will stop.

Appendix B – Gas servicing letter to Tenants

Date

Name and Address

Dear

Your Annual Gas Service

GLH has to carry out annual servicing of all gas appliances, i.e. your boiler and/or gas fire. This is to make sure that there are no gas or carbon monoxide leaks from gas appliances.

You have informed us that due to the current COVID – 19 situation our engineer will be unable to gain access to undertake the annual service. We fully understand the situation and want to reassure you that the safety of our tenants is very important to us.

We will monitor the situation weekly and keep in contact with you so that as soon as we can safely do so we will make an appointment for our engineer to visit the property.

In the meantime if you have any concerns or the situation within the property changes and we can arrange a visit, please contact our Helpdesk on **0300 003 7007**.

Yours sincerely

Ben Lane
Compliance & Services Manager

Appendix B – Electrical Testing letter to Tenants

Date

Name and Address

Dear

Your Electrical Test

GLH has to carry out an electrical safety test on your property every 5 years. This is to make sure that the electrical installation at your property is up to date and in full working order.

You have informed us that due to the current COVID – 19 situation our engineer will be unable to gain access to undertake the electrical test. We fully understand the situation and want to reassure you that the safety of our tenants is very important to us.

We will monitor the situation weekly and keep in contact with you so that as soon as we can safely do so we will make an appointment for our engineer to visit the property.

In the meantime if you have any concerns or the situation within the property changes and we can arrange a visit, please contact our Helpdesk on **0300 003 7007**.

Yours sincerely

Ben Lane
Compliance & Services Manager

Appendix C – Safe Working Method Statement



METHOD STATEMENT: COVID-19 SPECIFIC

| | |
|----------------------|---|
| Job / Project Title | General Repairs – Internal / External – 1 or more operatives |
| MS Date | 21/4/20 |
| Description of Works | General Multi-Skilled in 1 or multiple rooms. External works to 1 or multiple areas |
| Location | Internal / External |

RESOURCES REQUIRED

| | |
|----------------------------|---|
| On / Off-Site Supervision | Self-supervision with line management support and site visits |
| Operative Certificates | CSCS Cards / Asbestos Awareness / Manual Handling |
| Plant / Equipment Required | Power tools, hand tools, step ladders |
| Materials Required | General - timber, paints, sealants, fixings |

ASSESSMENT OF SIGNIFICANT RISKS FOR ALL ON-SITE TASKS

| | |
|--------------------------------|---|
| PPE Required | Masks, Gloves, Over-shoes, Coveralls. Hand Sanitizer. |
| Place of Work | |
| Access / Egress | Safe working access and knowledge must be obtained prior to attending site and agreed with the attending property and support. Operatives must have a clear access and egress route either internally or externally to the location of work. The access routes must not be populated by other support or tenants in the property during these works |
| Others at Risk or General Risk | During works ALL people on-site are at risk. A strict 2 metre social-distancing guideline must be adhered to at ALL times. Areas of work must be left clean with local surfaces sanitized. All other people on site other than the operative(s) must be kept away from the working area and in another room(s). Any risk to the general public will be taken into consideration for example, on-site parking and access routes. Prior to entering any site or property information will have been provided to ensure the safety of all occupants and operatives. |
| COSHH, noise, Manual Handling | See GLH / Resolve Solutions Risk Assessments for detailed information |

CONTROL MEASURES TO BE USED

| | |
|-----------------------------|---|
| PPE Register | PPE as noted above |
| Training & Guidance | Inc Tool Box Talks, Government Guidelines, Company Protocol |
| Other Info Specific to Site | <p>Ask the property contact the following questions and explain the strict current working guidelines:</p> <ol style="list-style-type: none">1) Does any person on-site have COVID-19 or is showing symptoms2) Is any person on-site self-isolating3) What are the Access / Egress routes to the property4) Is the work a 1 or 2 man job5) Can the work be completed whilst following social distancing guidelines <p>If at any time an operative(s) feel uncomfortable in a property they must advise support and vacate the property, they then must escalate this ASAP so we are aware of any issues raised.</p> |

INTERIM POLICY

Appendix D – 3 Tier system as at 16 October 2020

Tier 3 – Very High Risk

Liverpool
Lancashire

Tier 2 – High Risk

London
Essex
Elmbridge in Surrey
Barrow in Furness – Cumbria
York
North East Derbyshire
Chesterfield
Erewash, Derbyshire
Warrington
Derbyshire
High Peak area
West Yorkshire
South Yorkshire
North East
Tees Valley
West Midlands
Leicester
Nottinghamshire

Tier 1 – Medium Risk

Remaining areas

INTERIM POLICY